

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

ANDREA MOREHEAD ALLEN,

Plaintiff,

v.

TEGNA, INC. VIDEOINDIANA, INC.
WTHR CHANNEL 13,

Defendant.

Case No. 1:21-cv-00086-JMS-MJD

Judge Jane Magnus-Stinson

Magistrate Judge Mark J. Dinsmore

JOINT MOTION TO CONTINUE TRIAL

Plaintiff Andrea Morehead Allen and Defendants TEGNA Inc. and VideoIndiana, Inc. d/b/a WTHR Channel 13 (“the Parties”) pursuant to Fed. R. Civ. P. 16(b), Local Rule 16-3, and this Court’s Order granting Plaintiff’s Motion for Extension of Case Management Deadlines, ECF No. 70, respectfully request that the Court set the trial in this matter to be held on or after Monday, May 2, 2023. In support of this motion, the Parties state as follows:

1. Plaintiff previously filed a Complaint and Amended Complaint based on alleged violations of the Americans with Disabilities Act (“ADA”), 42 U.S.C. § 12101, *et seq.* (ECF No. 1, 15). Plaintiff retained new counsel on July 13, 2021. (ECF No. 39). On November 2, 2021, Plaintiff’s new counsel moved the Court and was granted leave to file her Second Amended Complaint and to continue all deadlines in the case by 90 days. (ECF No. 47, 48, 51, 52). Plaintiff added four new counts to her lawsuit claiming race discrimination; gender discrimination, harassment and hostile work environment, and breach of contract. (ECF No. 53, ¶¶ 100-114.) Defendants’ responsive pleading was due on November 26, 2021 and it filed an answer and partial motion to dismiss on that date. (ECF No. 51, 56-59). Defendants’ Motion has been fully briefed and is currently pending before the Court. (ECF No. 59-61).

2. On January 28, 2022, Plaintiff's filed her Second Motion for Extension of Time thereafter to complete necessary depositions, which the Court granted on January 31 2022. (ECF No. 64, 70).

3. Non-expert and liability discovery closes on April 8, 2022 and dispositive motions are due on May 6, 2022. (ECF No. 70). Expert disclosures are due in June and July 2022 and damages discovery closes on September 16, 2022. (*Id.*). The Court has requested that the Parties provide an agreeable trial date after February 2023. (*Id.*).

4. Given Counsel for the parties' trial and discovery schedules in other matters, the parties request a trial date on or after Monday, May 2, 2023.

DATED: February 16, 2022

Respectfully submitted,

PLAINTIFF ANDREA ALLEN MOREHEAD

DEFENDANTS TEGNA INC and
VIDEOINDIANA, INC. D/B/A WTHR
CHANNEL 13

/s/Amber K. Boyd

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CERTIFICATE OF SERVICE

I hereby certify that on February 16, 2022, I served the foregoing via the CM/ECF system, which will send notification of such filing to the following at their e-mail addresses on file with the Court:

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/s/ Christina Jaremus
One of the Attorneys for Defendants